CENTER FOR HUMAN ECOLOGY
KATHLEEN SULLIVAN
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Hello this is Dr. Kathleen Sullivan phoning from the Center for Human Ecology in Edinburgh, Scotland. I am calling to lodge my complaint against the U.S. DOE's present disposition plans for plutonium. The use of weapons grade plutonium in commercial nuclear reactors, otherwise known as MOX fuel, will involve all of the risks inherent to the nuclear industry, transportation risks, contamination risks, social risks that would cause certain affected communities, impoverished and ethnic communities, to be feeling more of a punch than the white privileged communities of America. 1

We understand here that the DOE has recently signed a contract with COGEMA and Duke Engineering & Services and Stone & Webster and they are now doing an analysis of producing MOX fuel which is presently, as I understand it, going through an ESI, EIS that is, and that in this proposal they would advocate preparing plutonium for MOX in South Carolina, North Carolina and Virginia. I also understand that the DOE has never held a hearing near any of the potential reactor sites which would use MOX fuel. I would like 2

to state my absolute condemnation against the program of MOX which would continue to advocate a plutonium economy in a world that is already saturated with fissile materials. The production of MOX is a crazy idea and it is no solution at all. Again this is Dr. Kathleen Sullivan phoning from the Center for Human Ecology in Edinburgh. Although I am living in the U.K., I am a U.S. citizen and my U.S. home in Boulder, Colorado, close to Rocky Flats which will be affected by any MOX fuel plan for the U.S. I can be reached at 44-131-624-1975. My address is Center for Human Ecology, P.O. Box 1972, Edinburgh, EH 12QL, Scotland. Thank you very much. 3

PR003

PR003–1 **MOX Approach**

DOE acknowledges the commentor's opposition to the MOX approach. DOE has identified as its preferred alternative the hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

Chapter 4 of Volume I provide the results of detailed impact analyses of the proposed surplus plutonium disposition facilities and reactors. Risks and consequences are addressed. The impacts on workers and the general population associated with normal operations and postulated accidents are included in these analyses. Included are the potential impacts on waste management, socioeconomics, and transportation. Chapter 4 also includes an analysis of the potential impacts on minority and low-income populations for each of the alternatives considered. Appendix M describes the process that was used to obtain these impacts and gives additional detail on the minority and low-income populations surrounding each of the candidate sites.

PR003–2 **General SPD EIS and NEPA Process**

In March 1999, DOE awarded a contract to a team known as DCS, which is comprised of Duke Engineering & Services, COGEMA Inc., and Stone & Webster to provide MOX fuel fabrication and irradiation services.

DOE acknowledges the commentor's concern regarding public hearings near the proposed reactor sites that would use the MOX fuel. During the public comment period on the *Supplement to the SPD Draft EIS*, DOE held a public hearing in Washington, D.C., on June 15, 1999, and invited comments. Although DOE decided not to hold additional hearings on the *Supplement*, DOE provided other means for the public to express their concerns and provide comments: mail, a toll-free telephone and fax line, and the MD Web site. Also, at the invitation of South Carolina State Senator Phil Leventis,

DOE attended and participated in a public hearing held on June 24, 1999, in Columbia, South Carolina. Moreover, interested parties would likely have the opportunity to submit additional comments during the NRC reactor license amendment process should the MOX approach be pursued per the SPD EIS ROD.

PR003–3 **DOE Policy**

Use of MOX fuel in domestic, commercial reactors is not proposed in order to advocate a plutonium economy. Rather, the purpose of this proposed action is to safely and securely disposition surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors. The use of U.S. surplus plutonium in existing domestic, commercial reactors does not involve reprocessing (reprocessing is a chemical separation of uranium, transuranic elements [including plutonium], and fission products from spent reactor fuel and the reuse of the plutonium and uranium to produce new fresh fuel) and therefore does not support building a plutonium economy.